

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 1-4,

Plaintiffs,

v.

RED ROOF INNS, et al.,

Defendants.

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**Civil Action No.
1:21-cv-04278 WMR**

**DEFENDANTS RED ROOF INNS, INC., FMW RRI NC, LLC, RRI III,
LLC, RRI WEST MANAGEMENT, LLC, RRI FRANCHISING, LLC, AND
WESTMONT HOSPITALITY GROUP, INC.’S DESIGNATION AND
DISCLOSURE OF EXPERT WITNESSES**

Pursuant to Rule 26 (a)(2) of the Federal Rules of Civil Procedure and the Court’s Scheduling Order, Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, RRI III, LLC, RRI West Management, LLC, RRI Franchising, LLC, and Westmont Hospitality Group, Inc.(“Defendants”) submit the following Designation and Disclosure of Expert Witnesses and persons who may provide expert testimony pursuant to Rule 702, 703, or 705 of the Federal Rules of Evidence. This Designation and Disclosure, along with all Expert Reports, exhibits and attachments thereto, are hereby designated CONFIDENTIAL and subject to the Protective Order. Accordingly, the Expert Reports shall be submitted directly to the parties via electronic mail to comply with the Protective Order.

I. RETAINED EXPERT WITNESSES

- 1) Kimberly Mehlman-Orozco, PH.D. (Human Trafficking Expert)**
Break the Chain, LLC
15920 Fairway Drive
Dumfries, Virginia 22025

Defendants disclose Kimberly Mehlman-Orozco, PH.D. and refer Plaintiff to Dr. Mehlman-Orozco's Expert Report, and all subparts and attachments thereto, which sets forth his opinions and the reasons and bases for her opinions. Dr. Mehlman-Orozco's Expert Report and corresponding attachments set forth the facts, data and information considered by Dr. Mehlman-Orozco's in forming her opinions, the exhibits that Dr. Mehlman-Orozco's may use to support her opinions, and Dr. Mehlman-Orozco's qualifications, publications, testimonial history for the previous four years, and compensation. Defendants hereby incorporate by reference Dr. Mehlman-Orozco's Expert Report and all subparts and attachments thereto.

- 2) Matthew W. Norman, M.D. (Forensic Psychiatrist)**
Matthew W Norman, MD, LLC.
One Riverside
4401 Northside Parkway, NW
Suite 245
Atlanta, GA 30327

Defendants disclose Matthew W. Norman, M.D. and refers Plaintiff to Dr. Norman's Expert Report, and all subparts and attachments thereto, which sets forth his opinions and the reasons and bases for his opinions. Dr. Norman's Expert Report

and corresponding attachments set forth the facts, data and information considered by Dr. Norman in forming his opinions, the exhibits that Dr. Norman used, or may use, to support his opinions, and Dr. Norman's qualifications, publications, testimonial history for the previous four years, and compensation. Defendants refer Plaintiff to Dr. Norman's curriculum vitae and testimonial history produced herewith. Defendant hereby incorporates by reference Dr. Norman's Expert Report and all subparts and attachments thereto.

II. RESERVATIONS

1. Defendants reserve the right to elicit testimony, either through direct examination or cross-examination, of all witnesses designated or identified by Plaintiff or Defendants, or who have been deposed in this litigation as an expert or person with specialized knowledge, training, or experience pursuant to FRE 702, 703, or 705, including retained or non-retained experts disclosed by Plaintiff.

2. Fact discovery is currently ongoing, and Defendants have scheduled, and are in the process of scheduling, fact witnesses depositions. Accordingly, Defendants reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses and Expert Reports through the discovery process upon receiving the additional discovery including, but not limited to expert depositions, fact depositions, exhibits

introduced in depositions, documents produced, newly identified, collected, and/or produced medical records, and any supplemental expert disclosures or reports by any party.

3. Defendants reserve the right to disclose and call witnesses necessitated by Plaintiff's identification of certain witnesses and proposed evidence.

4. Defendants reserve the right to disclose and call witnesses necessitated by depositions taken subsequent to the date of this submission including the depositions of Plaintiff, family members, eyewitnesses, treating physicians, to the extent not yet completed, and proffered experts, which at this time are not yet complete.

5. Defendant reserves the right to designate additional expert witnesses and/or supplement this Designation and Disclosure should Plaintiff supplement her expert designations or offer rebuttal experts.

6. Defendant reserves the right to strike any and all of Plaintiff's experts prior to deposition and/or trial.

7. By identifying an area of testimony or issue in this Designation and Disclosure or any of the expert reports referenced herein, Defendant does not waive, and expressly reserves, any and all objections to the relevancy and admissibility of evidence or testimony concerning that issue.

Dated this 6th day of September, 2022.

Lewis Brisbois Bisgaard & Smith LLP

By: /s/ Adi Allushi

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RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: September 6, 2022.

/s/ *Adi Allushi*

ADI ALLUSHI

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of September 2022, filed the within and foregoing pleading which automatically sends an electronic copy to all counsel of records as follows:

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